

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy No. 19-70386-JAD
Jerry A. McKinney and)
Kathy J. McKinney,) Chapter 13
Debtors,)
Jerry A. McKinney and) Related Document No. 37-38
Kathy J. McKinney,)
Movants,) Hearing Date: 09/20/19 @ 11:00 a.m.
vs.) Response Due: 09/09/19
Ronda Winnecour, Chapter 13 Trustee,)
Respondent.) Document No.

**CERTIFICATION OF NO OBJECTION REGARDING
MOTION TO EMPLOY SPECIAL COUNSEL
- Document No. 37**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the **Motion To Employ Special Counsel** filed on August 21, 2019 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the **Motion To Employ Special Counsel** appears thereon. Pursuant to the Notice of Hearing, objections to the **Motion To Employ Special Counsel Extend Automatic Stay** were to be filed and served no later than September 9, 2019.

It is hereby respectfully requested that the Order attached to the **Motion To Employ Special Counsel** be entered by the Court.

Dated: September 10, 2019

/s/ Donald R. Calaiaro
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